

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: DONALD DURAND WARREN
DEBTOR**

**CHAPTER 13
CASE NO. 17-14615 JDW**

RESPONSE TO TRUSTEE'S MOTION TO DISMISS [DKT. #56]

COMES NOW, Donald Durand Warren, by and through his attorney of record, and in response to the Trustee's Motion To Dismiss and would show as follows:

The Debtor respectfully requests that his Chapter 13 not be dismissed. Debtor was unaware that he was behind in his plan payments. Debtor is attempting to catch up his delinquency before a hearing in this matter. Debtor requests any arrearage be added back into his plan and paid over the remaining months of the plan.

WHEREFORE, PREMISES CONSIDERED, Debtor prays, upon a hearing hereon, this Court deny Trustee's Motion To Dismiss. Debtor prays also for such other relief, general or specific, to which he may be entitled.

RESPECTFULLY SUBMITTED,

/s/ Robert H. Lomenick
ROBERT H. LOMENICK, MSB #104186
SCHNELLER & LOMENICK, P.A.
126 NORTH SPRING STREET
POST OFFICE BOX 417
HOLLY SPRINGS, MISSISSIPPI 38635
(662) 252-3224/rlomenick@gmail.com

CERTIFICATE OF SERVICE

I, Robert H. Lomenick, Attorney for Debtor, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Response To Motion To Dismiss to the Debtor, either by electronic means or by United States Mail to the following:

Locke Barkley, via ECF

U.S. Trustee, via ECF

This the 28th day of January, 2021.

/s/Robert H. Lomenick
ROBERT H. LOMENICK